

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

Amanda Hager	:	Civil Action No. 17-cv-07450
	:	
Plaintiff(s)	:	Hon. MCA-MAH
	:	
v.	:	JOINT PROPOSED DISCOVERY PLAN¹
	:	
. NATIONAL RECOVERY AGENCY	:	
	:	
Defendant(s)	:	
	:	
	:	

1. Set forth the name of each attorney appearing, the firm name, address and telephone number and facsimile number of each, designating the party represented.
Lawrence Katz 70 East Sunrise Hwy, #500 Valley Stream, NY 11581 51637
2. Set forth a brief description of the case, including the causes of action and defenses asserted. FDCPA violations
3. Have settlement discussions taken place? Yes No _____
(a) What was plaintiff's last demand?
(1) Monetary demand: \$ 11500
(2) Non-monetary demand: _____
(b) What was defendant's last offer?
(1) Monetary offer: \$ 1001 + Costs and Attorney Fees
(2) Non-monetary offer: _____
4. The parties [have _____ have not] met pursuant to Fed. R. Civ. P. 26(f):

5. The parties [have _____ have not] exchanged the information required by Fed. R. Civ. P. 26(a)(1). If not, state the reason therefor.
6. Explain any problems in connection with completing the disclosures required by Fed R. Civ. P. 26(a)(1) Discovery is needed for disclosures of legal fees and satisfaction of judgment
7. The parties [have _____ have not] conducted discovery other than the above disclosures. If so, describe.
8. Proposed joint discovery plan:
 - (a) Discovery is needed on the following subjects: Legal Fees
 - (b) Discovery [should _____ should not _____] be conducted in phases or be limited to particular issues. Explain.
 - (c) Proposed schedule:
 - (1) Fed. R. Civ. P. 26 Disclosures Initial Disclosures
 - (2) E-Discovery conference pursuant to L. Civ. R. 26.1(d) N/A.
 - (3) Service of initial written discovery 03/19/2018.
 - (4) Maximum of 0 Interrogatories by each party to each other party.
 - (5) Maximum of 0 depositions to be taken by each party.
 - (6) Motions to amend or to add parties to be filed by N/A.
 - (7) Factual discovery to be completed by N/A.
 - (8) Plaintiff's expert report due on N/A.
 - (9) Defendant's expert report due on N/A.
 - (10) Expert depositions to be completed by N/A.
 - (11) Dispositive motions to be served within 30 days of completion of discovery.
 - (d) Set forth any special discovery mechanism or procedure requested.
Disclosure of insurance records

(e) A pretrial conference may take place on N/A.

(f) Trial date: _____ (Jury Trial; Non-Jury Trial).

9. Do you anticipate any special discovery needs (i.e., videotape/telephone depositions, problems with out-of-state witnesses or documents, etc)? Yes No . If so, please explain.

10. Do you anticipate any issues about disclosure or discovery of electronically stored information, including the form or forms in which it should be produced? Yes No X.

If so, how will electronic discovery or data be disclosed or produced? Describe any agreements reached by the parties regarding same, including costs of discovery, production, related software, licensing agreements, etc.

N/A

11. Do you anticipate entry of a Discovery Confidentiality Order? See L.Civ.R. 5.3(b) and Appendix S.

12. Do you anticipate any discovery problem(s) not listed above? Describe.

Yes X No . Defendant refuses to pay costs and legal fees

13. State whether this case is appropriate for voluntary arbitration (pursuant to Local Civil Rule 201.1 or otherwise) or mediation (pursuant to Local Civil Rule 301.1 or otherwise). If not, explain why and state whether any such procedure may be appropriate at a later time (i.e., after exchange of pretrial disclosures, after completion of depositions, after disposition or dispositive motions, etc.). N/A

14. Is this case appropriate for bifurcation? Yes No X

15. An interim status/settlement conference (with clients in attendance), should be held in Yes, 2/21/2018.

16. We [do do not X] consent to the trial being conducted by a Magistrate Judge.

17. Identify any other issues to address at the Rule 16 Scheduling Conference.
Defendant wants to litigate the attorney fees

L. Katz
Attorney(s) for Plaintiff(s) / Date

Attorney(s) for Defendant(s) / Date